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Office of the United States Attorney  
District of Nevada  
Lloyd D. George Federal Courthouse  
333 Las Vegas Boulevard South, Suite 5000  
Las Vegas, NV 89101  
(702) 388-6336

1 DANIEL G. BOGDEN  
 United States Attorney  
 Nevada Bar No. 2137  
 2 DANIEL D. HOLLINGSWORTH  
 Assistant United States Attorney  
 Nevada State Bar No. 1925  
 3 Lloyd D. George United States Courthouse  
 333 Las Vegas Boulevard South, Suite 5000  
 4 Las Vegas, Nevada 89101  
 Telephone: (702) 388-6336  
 5 Facsimile: (702) 388-6787  
 E-mail: Daniel.Hollingsworth@usdoj.gov  
 6 Counsel for the United States of America  
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FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
FEB 18 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA, )  
 13 Plaintiff, )  
 14 v. ) 2:14-CR-015-JCM-(VCF)  
 15 ALEXANDER JARIV, )  
 16 Defendant. )

17 **THE UNITED STATES OF AMERICA'S MOTION TO RECORD A JOHN DOE PRELIMINARY**  
 18 **ORDER OF FORFEITURE IN PLACE OF THE SEALED PRELIMINARY ORDER OF**  
 19 **FORFEITURE (ECF NO. 11) WITH THE CLARK COUNTY RECORDER'S OFFICE**

20 The United States of America ("United States"), by and through Daniel G. Bogden, United States  
 Attorney for the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney,  
 21 respectfully requests this Court to sign the United States' attached proposed John Doe Preliminary Order  
 22 of Forfeiture (Exhibit 1), to certify three copies, and to request permission to record the John Doe  
 23 Preliminary Order of Forfeiture with the Clark County Recorder's Office in lieu of the Sealed Preliminary  
 24 Order of Forfeiture which was filed on or about February 3, 2014. See attached Exhibit 1, proposed John  
 25 Doe Preliminary Order of Forfeiture and Exhibit 2, Sealed Preliminary Order of Forfeiture (ECF No. 11).

26 ...

1 This case was sealed to protect the defendant as a confidential informant in the case of *United*  
2 *States of America v. James Jariv et al.*, court case number 2:14-CR-006-APG-(GWF). The United  
3 States desires to keep the confidential informant protected from the defendants in the above-named  
4 criminal case. The sealed Preliminary Order of Forfeiture has forfeited specific property to the United  
5 States and orders the United States to take custody of the assets. One of the assets is real property. To  
6 take custody of it, the United States must record the Preliminary Order of Forfeiture with the Clark  
7 County Recorder's Office. The recording also protects the United States' interests in the real property.

8 The way to achieve the protection of the confidential informant and the United States' interest  
9 in the property by the recording of the Preliminary Order of Forfeiture is to request the court: allow the  
10 United States to submit a proposed John Doe Preliminary Order of Forfeiture; sign the proposed John  
11 Doe Preliminary Order of Forfeiture; have the court clerk certify three copies; and allow the United  
12 States to record the John Doe Preliminary Order of Forfeiture with the County Recorder's Office.

13 The United States wants the original Preliminary Order of Forfeiture to remain under seal as  
14 part of the record. By filing the attached John Doe Preliminary Order of Forfeiture, the United States  
15 will be able to file the Preliminary Order of Forfeiture with the County Recorder to take possession of  
16 the property listed in the Preliminary Order of Forfeiture to protect its interest. The United States will  
17 publish immediately under the name of John Doe in the government forfeiture website,  
18 [www.forfeiture.gov](http://www.forfeiture.gov). Service of the potential claimants with the Preliminary Order of Forfeiture will  
19 occur after the case is unsealed.

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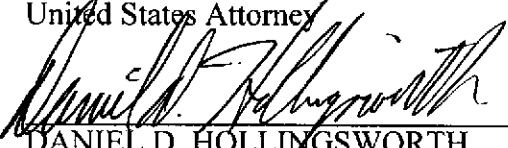
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1 For these reasons, this Court should sign the United States' attached John Doe Preliminary Order  
2 of Forfeiture (Exhibit 1) and grant permission to record it with the Clark County Recorder's Office in lieu  
3 of the Preliminary Order of Forfeiture which was filed under seal on or about February 3, 2014.

4 DATED this 18<sup>th</sup> day of February, 2014.

5 DANIEL G. BOGDEN  
United States Attorney

6   
7 DANIEL D. HOLLINGSWORTH  
8 Assistant United States Attorney

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11 IT IS SO ORDERED.

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13 UNITED STATES DISTRICT JUDGE

14 DATED: March 13, 2014  
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**PROOF OF SERVICE**

I, Heidi L. Skillin, Paralegal, certify that the following individuals were served with copies of  
**THE UNITED STATES OF AMERICA'S MOTION TO RECORD A JOHN DOE PRELIMINARY  
ORDER OF FORFEITURE IN PLACE OF THE SEALED PRELIMINARY ORDER OF  
FORFEITURE (ECF NO. 11) WITH THE CLARK COUNTY RECORDER'S OFFICE** on February  
18, 2014, by the below identified method of service:

First Class Mail

John Kinchen  
1221 McKinney, Suite 3150  
Houston, TX 77010  
Counsel for Alexander Jariv

  
HEIDI L. SKILLIN  
Forfeiture Support Associates Paralegal

# EXHIBIT 1

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EXHIBIT 1

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. ) 2:14-CR-015-JCM-(VCF)  
 )  
JOHN DOE, )  
 )  
Defendant. )

**PRELIMINARY ORDER OF FORFEITURE**

This Court finds that on or about January 22, 2014, defendant JOHN DOE pled guilty to Count One of a One-Count Criminal Information charging him with Conspiracy to: Commit Wire Fraud in violation of Title 18, United States Code, Section 1343; make false statements under the Clean Air Act in violation of Title 42, United States Code, Section 7413(c)(2)(A); and Launder Monetary Instruments in violation of Title 18, United States Code, Section 1956; all in violation of Title 18, United States Code, Section 371. Information, ECF No. \_\_; Change of Plea, ECF No. \_\_; Plea Memorandum, ECF No. \_\_.

This Court finds defendant JOHN DOE agreed to the forfeiture of the property set forth in the Plea Memorandum and the Forfeiture Allegation of the Criminal Information. Information, ECF No. \_\_; Change of Plea, ECF No. \_\_; Plea Memorandum, ECF No. \_\_.

This Court finds, pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2), the United States of America has shown the requisite nexus between property set forth in the Plea Memorandum and the Forfeiture Allegation of the Criminal Information and the offense to which defendant JOHN DOE pled guilty.

1 The following assets are subject to forfeiture pursuant to Title 18, United States Code, Section  
2 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section  
3 982(a)(1); and Title 21, United States Code, Section 853(p):

- 4 1. Cash in the amount of \$42,000;
- 5 2. 2007 Hummer H2, bearing Nevada tag 953 YZT, VIN 5GRGN23U77H100987;
- 6 3. Real Property located at 322 Karen Avenue, #1801, Las Vegas, NV Clark County  
7 parcel number 162-10-114-121, including all structures, appurtenances, and  
8 improvements thereon;
- 9 4. Contents of Bank of Montreal Account No. 3970448;
- 10 5. Contents of Bank of Montreal Account No. 4781218;
- 11 6. Contents of American First Credit Union Account No. 27844083-1; and
- 12 7. Contents of any other foreign or domestic bank account involved in the offense and  
13 any property traceable to such property  
14 (all of which constitutes "property").

15 This Court finds the United States of America is now entitled to, and should, reduce the  
16 aforementioned property to the possession of the United States of America.

17 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the  
18 United States of America should seize the aforementioned property.

19 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all right, title, and interest of  
20 JOHN DOE in the aforementioned property is forfeited and is vested in the United States of America  
21 and shall be safely held by the United States of America until further order of the Court.

22 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States of America  
23 shall publish for at least thirty (30) consecutive days on the official internet government forfeiture  
24 website, [www.forfeiture.gov](http://www.forfeiture.gov), notice of this Order, which shall describe the forfeited property, state the  
25 time under the applicable statute when a petition contesting the forfeiture must be filed, and state the  
26 ...



1 name and contact information for the government attorney to be served with the petition, pursuant to  
2 Fed. R. Crim. P. 32.2(b)(6) and Title 21, United States Code, Section 853(n)(2).

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual or entity  
4 who claims an interest in the aforementioned property must file a petition for a hearing to adjudicate  
5 the validity of the petitioner's alleged interest in the property, which petition shall be signed by the  
6 petitioner under penalty of perjury pursuant to Title 21, United States Code, Section 853(n)(3) and  
7 Title 28, United States Code, Section 1746, and shall set forth the nature and extent of the petitioner's  
8 right, title, or interest in the forfeited property and any additional facts supporting the petitioner's  
9 petition and the relief sought.

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any, must be filed  
11 with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, no later than  
12 thirty (30) days after the notice is sent or, if direct notice was not sent, no later than sixty (60) days  
13 after the first day of the publication on the official internet government forfeiture site,  
14 [www.forfeiture.gov](http://www.forfeiture.gov).

15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the petition, if any,  
16 shall be served upon the Asset Forfeiture Attorney of the United States Attorney's Office at the  
17 following address at the time of filing:

18 Daniel D. Hollingsworth  
19 Assistant United States Attorney  
20 Lloyd D. George United States Courthouse  
333 Las Vegas Boulevard South, Suite 5000  
Las Vegas, Nevada 89101.

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice described herein  
22 need not be published in the event a Declaration of Forfeiture is issued by the appropriate agency  
23 following publication of notice of seizure and intent to administratively forfeit the above-described  
24 property.

1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk's Office will  
2 provide a three certified copies of this Order to the United States Attorney's Office, Daniel D.  
3 Hollingsworth, Assistant United States Attorney.

4 DATED this \_\_\_\_ day of \_\_\_\_\_, 2014.  
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8 UNITED STATES DISTRICT JUDGE  
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# EXHIBIT 2

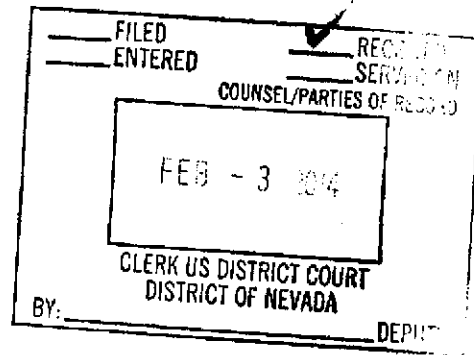
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# EXHIBIT 2

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District of Nevada  
Lloyd D. George Federal Courthouse  
333 Las Vegas Boulevard South, Suite 5000  
Las Vegas, NV 89101  
(702) 388-6336



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6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 ALEXANDER JARIV,

12 Defendant.

2:14-CR-015-JCM-(VCF)

13 PRELIMINARY ORDER OF FORFEITURE

14 This Court finds that on or about January 22, 2014, defendant ALEXANDER JARIV pled  
15 guilty to Count One of a One-Count Criminal Information charging him with Conspiracy to: Commit  
16 Wire Fraud in violation of Title 18, United States Code, Section 1343; make false statements under the  
17 Clean Air Act in violation of Title 42, United States Code, Section 7413(c)(2)(A); and Launder  
18 Monetary Instruments in violation of Title 18, United States Code, Section 1956; all in violation of  
19 Title 18, United States Code, Section 371. Information, ECF No. \_\_; Change of Plea, ECF No. \_\_;  
20 Plea Memorandum, ECF No. \_\_.

21 This Court finds defendant ALEXANDER JARIV agreed to the forfeiture of the property set  
22 forth in the Plea Memorandum and the Forfeiture Allegation of the Criminal Information. Information,  
23 ECF No. \_\_; Change of Plea, ECF No. \_\_; Plea Memorandum, ECF No. \_\_.

24 This Court finds, pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2), the United States of America  
25 has shown the requisite nexus between property set forth in the Plea Memorandum and the Forfeiture  
26

1 Allegation of the Criminal Information and the offense to which defendant ALEXANDER JARIV  
2 pled guilty.

3 The following assets are subject to forfeiture pursuant to Title 18, United States Code, Section  
4 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section  
5 982(a)(1); and Title 21, United States Code, Section 853(p):

- 6 1. Cash in the amount of \$42,000;
- 7 2. 2007 Hummer H2, bearing Nevada tag 953 YZT, VIN 5GRGN23U77H100987;
- 8 3. Real Property located at 322 Karen Avenue, #1801, Las Vegas, NV Clark County  
9 parcel number 162-10-114-121, including all structures, appurtenances, and  
10 improvements thereon;
- 11 4. Contents of Bank of Montreal Account No. 3970448;
- 12 5. Contents of Bank of Montreal Account No. 4781218;
- 13 6. Contents of American First Credit Union Account No. 27844083-1; and
- 14 7. Contents of any other foreign or domestic bank account involved in the offense and  
15 any property traceable to such property  
16 (all of which constitutes "property").

17 This Court finds the United States of America is now entitled to, and should, reduce the  
18 aforementioned property to the possession of the United States of America.

19 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the  
20 United States of America should seize the aforementioned property.

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all right, title, and interest of  
22 ALEXANDER JARIV in the aforementioned property is forfeited and is vested in the United States of  
23 America and shall be safely held by the United States of America until further order of the Court.

24 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States of America  
25 shall publish for at least thirty (30) consecutive days on the official internet government forfeiture  
26 website, [www.forfeiture.gov](http://www.forfeiture.gov), notice of this Order, which shall describe the forfeited property, state the

1 time under the applicable statute when a petition contesting the forfeiture must be filed, and state the  
2 name and contact information for the government attorney to be served with the petition, pursuant to  
3 Fed. R. Crim. P. 32.2(b)(6) and Title 21, United States Code, Section 853(n)(2).

4 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual or entity  
5 who claims an interest in the aforementioned property must file a petition for a hearing to adjudicate  
6 the validity of the petitioner's alleged interest in the property, which petition shall be signed by the  
7 petitioner under penalty of perjury pursuant to Title 21, United States Code, Section 853(n)(3) and  
8 Title 28, United States Code, Section 1746, and shall set forth the nature and extent of the petitioner's  
9 right, title, or interest in the forfeited property and any additional facts supporting the petitioner's  
10 petition and the relief sought.

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any, must be filed  
12 with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, no later than  
13 thirty (30) days after the notice is sent or, if direct notice was not sent, no later than sixty (60) days  
14 after the first day of the publication on the official internet government forfeiture site,  
15 [www.forfeiture.gov](http://www.forfeiture.gov).

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the petition, if any,  
17 shall be served upon the Asset Forfeiture Attorney of the United States Attorney's Office at the  
18 following address at the time of filing:

19 Daniel D. Hollingsworth  
20 Assistant United States Attorney  
21 Lloyd D. George United States Courthouse  
22 333 Las Vegas Boulevard South, Suite 5000  
23 Las Vegas, Nevada 89101.  
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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice described herein  
2 need not be published in the event a Declaration of Forfeiture is issued by the appropriate agency  
3 following publication of notice of seizure and intent to administratively forfeit the above-described  
4 property.

5 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk's Office will  
6 provide a copy of this Order to the United States Attorney's Office, Daniel D. Hollingsworth,  
7 Assistant United States Attorney.

8 DATED February 5, 2014.

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12 UNITED STATES DISTRICT JUDGE  
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**PROOF OF SERVICE**

I, Heidi L. Skillin, Paralegal, certify that the following individuals were served with copies of the Preliminary Order of Forfeiture on February 3, 2014, by the below identified method of service:

First Class Mail

John Kinchen  
1221 McKinney, Suite 3150  
Houston, TX 77010  
Counsel for Alexander Jariv

/s/Heidi L. Skillin  
HEIDI L. SKILLIN  
Forfeiture Support Associates Paralegal